

3A  
FRC

ENFORCEMENT DISPOSITION DOCUMENT

PART I

Inspection Information

CREL Information

(Complete upon returning from inspection trip.)

EPA Identification Number: CAD000378044

Handler/Facility Name: DOUGLAS AIRCRAFT CO.

Handler/Facility Address: 3855 LAKEWOOD BLVD.

LONG BEACH, CA 90846

FIRST Day of Inspection: AUGUST 21, 1990

Inspection Type: (Circle all those that apply; if none apply, continue with inspector's name.)

☒ CEI (01) (Compliance Evaluation Inspection)

☐ CAO (13) (Corrective Action Oversight)

☐ CME (04) (Comprehensive Monitoring Eval.: GW)

☐ O&M (12) (Operation & Maintenance: GW)

Lead Inspector's Name: BARBARA SOTKOWS

Responsible Agency: EPA

Contractor's Name (if applicable): PRC

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Additional Inspection Information

(Complete upon returning from inspection trip.)

Inspection Type: (Circle one, if applicable in addition to above.)

☐ SO (State Oversight)

☐ CO (Contractor Oversight)

☐ SAM (Sampling)

☐ FU (Follow-up; focused CEI)

Type of Facility: LDF (Land Disposal Facility)  
(Circle one)

☐ TSF (Treatment and/or Storage Facility)

☒ GEN (Generator)

☐ OTH (Other: Non-notifier, transporter, etc.)

Facility Owner: F (Federal), S (State), L (Local)  
(Circle one)

T (Tribal), ☒ P (Private)

Additional Inspection Information (cont'd)

State/DHS Office: 1SAC      2EM      3LA      4LB  
 (Circle one)

                         1HI      1AZ      1NV      1GU      1TT

Duration of Inspection (days): 1

Last Inspection (MM/DD/YY): None

Brianne Jenkins      8-23-90  
 Inspector                      Date

Jean E. Daniel      8/23/90  
 Section Chief                      Date

\_\_\_\_\_  
 Date entered TMS  
 (Initial & date)

\_\_\_\_\_  
 Date entered HWDMS  
 (Initial & date)

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PART II                      Violation Determination Information  
 (Complete upon issuing warning letter.)

Compliance Officer: PRC  
 (If other than inspector)

Class of Violator:                      HPV                      MPV                      LPV  
 (Circle one)

Inspection Report Completion Date (MM/DD/YY): 10/19/90  
 (Date S. C. concurs on the report/WL)

Warning Letter Date (MM/DD/YY): 10/23/90

Due Date for Warning Letter Response (MM/DD/YY): 11/23/90

Due Date for Resolution of Case (MM/DD/YY): 2/2/91  
 (135, 165, 195 days from inspection)

Proposed HWDMS entry:  
 (Classification of each violation is attached.)

	GWM	CL/P	FIN	PB	CS	MAN	OTH	LB	Enf.* Code	Action Date
Class I						X	X	X		
II						O				

NOTE: HWDMS should be coded as follows: X (violation), O (no violation), S (same/continuing violation from previous inspection), or I (Insurance/financial liability only). If the facility is an HPV, show "H" in the "OTH" column and "Xs" and "Os" in the appropriate violation categories.

\* Check HWDMS turnaround document for appropriate codes.

EPA ID No.: C A D 0 0 8 3 7 8 0 4 4

Facility Name: DOUGLAS AIRCRAFT

SNC Status:

Yes (Y)

No (N)

Barbara Grobeos 10/1/90  
Inspector/CO Date

Jean E. Daniel 10/15/90  
Section Chief Date

Date entered TMS  
(Initial & date)

TMS 10/1/90

Date entered HWDMS  
(Initial & date)

PART III

Warning Letter Response Information  
(Complete upon review of response to WL.)

Response  
rec'd 11/28/90  
jed

Date of Facility's Response to warning letter (WL): 1st: 11/28/90

Facility's Response (check appropriate box):

2nd: 2/1/91

( ☒ ) adequately addresses and/or documents the facility's compliance with the regulations cited in EPA's WL, the facility has returned to compliance (RTC) and the following "actual date" (date facility came into compliance) should be entered into TMS and HWDMS. Explanation of facility's documentation of compliance efforts is attached. Actual date = 2/1/91

( ) does not adequately address the violations cited in EPA's WL. The inspector/compliance officer recommends the following action:

( ) Seek informal resolution of case by calling/writing for additional information.

( ) Initiate formal enforcement action.

Barbara Grobeos 2-8-91  
Inspector/CO Date

Jean E. Daniel 2/11/91  
Section Chief Date

Date entered TMS if RTC  
(Initial & date)

Date entered HWDMS if RTC  
(Initial & date)

Formal Enforcement Information (Complaint/NON)  
(Complete upon issuance of action.)

Comment: \_\_\_\_\_

Section Chief	Date
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Date entered HWDMS  
(Initial & date)

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Consent Agreement Information  
(Complete upon issuance of agreement.)

Comment: \_\_\_\_\_

Section Chief	Date
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Date entered HWDMS  
(Initial & date)

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RTC

POTENTIAL VIOLATIONS

EPA Review

11/21/90	262.11	Douglas Aircraft misclassifies its copper cyanide wastes as P029, its cyanide wastes as P030, and its sodium cyanide wastes as P106; this classification is inappropriate since these waste are not discarded commercial chemical products, off-specification species, container residues, nor spill residues thereof. In addition, the label on one drum marked "hazardous waste - cyanide filters" (Appendix C, Photograph 7) indicated the waste was "non-RCRA," when it should have been marked as a RCRA-regulated hazardous cyanide waste.	Class I	See Response dtd 11/21/90
11/21/90	262.34(a)(2)	One unlabeled drum of desmut in the accumulation area did not have an accumulation date marked on it.	Class I	11/21/90
11/21/90	262.34(a)(4) directing to 265.35	There was inadequate aisle space in the bay containing acidic wastes in the accumulation area at Building 47 (Appendix C, Photographs 2 and 3).	Class I	11/21/90
2/1/91	268.7(a)(6)	Douglas Aircraft does not maintain copies of LDR notifications sent off-site with manifests.	Class I	2/1/91

Facility is classified as a MPV since there was no evidence of releases of hazardous waste to the environment at the facility.